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19 *NEW U LIFE CORPORATION*

20
21 **UNITED STATES DISTRICT COURT**
22
23 **DISTRICT OF NEVADA**

24 T1 PAYMENTS LLC, a Nevada limited
25 liability company,

26 Plaintiff,

27 vs.

18 NEW U LIFE CORPORATION, a
19 California corporation,

20 Defendant.

21 AND RELATED COUNTERCLAIM

22 Case No. 2:19-cv-01816-ART-DJA

23 **MOTION OF ROME LLP TO
24 WITHDRAW AS COUNSEL *PRO HAC
25 VICE*; DECLARATION OF BRIANNA
26 DAHLBERG; ~~[PROPOSED]~~ ORDER**

27 Pursuant to Local Rule IA 11-6 and Rule 1.16 of the Nevada Rules of Professional Conduct,
28 undersigned counsel moves the Court for an order authorizing Rome LLP, and its individual
attorneys Eugene Rome and Brianna Dahlberg (collectively, "Rome LLP"), to withdraw as counsel
pro hac vice for Defendant and Counterclaimant New U Life Corporation ("New U Life").

1 This Motion is made and based upon the following points and authorities and the pleadings
2 and papers on file herein.

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4 DATED: March 12, 2024

ROME LLP

5 By: /s/ Brianna Dahlberg

6 Brianna Dahlberg, Esq.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Local Rule IA 11-6(b) provides, “If any attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel.” Furthermore, LR 11-6(e) provides that “no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case.” Similarly, Nevada Rule of Professional Conduct 1.16(b) provides that a lawyer may withdraw from representing a client if “[w]ithdrawal can be accomplished without material adverse effect on the interests of the client.”

9 On September 11, 2020, Eugene Rome and Brianna Dahlberg of Rome LLP (f/k/a Rome &
10 Associates, A.P.C.) each filed a Verified Petition For Permission To Practice In This Case Only By
11 Attorney Not Admitted To The Bar Of This Court And Designation Of Local Counsel (the “Pro Hac
12 Vice Motions”). See Dkt. #31 and #32. The Pro Hac Vice Motions were subsequently granted on
13 September 14, 2020. See Dkt. #33 and #34.

14 Rome LLP now moves for an order allowing the firm and its individual attorneys to
15 withdraw as counsel *pro hac vice* in this matter. Rome LLP makes this motion with the consent of
16 its client, New U Life. Declaration of Brianna Dahlberg, ¶ 4. New U Life’s local counsel, Puoy K.
17 Premsrirut, will remain as lead counsel to New U Life, ensuring continuity in New U Life’s legal
18 representation. As such, Rome LLP’s withdrawal from this matter will have no effect on the
19 schedule of this matter, including discovery, hearings, or trial, nor will it have any adverse effect on
20 New U Life’s litigation of this case.

CONCLUSION

22 For the foregoing reasons, Rome LLP respectfully requests that the Court allow Rome LLP
23 and its individual attorneys Eugene Rome and Brianna Dahlberg to withdraw as counsel *pro hac*
24 *vice* for New U Life.

26 | DATED: March 12, 2024

ROME LLP

27

By: /s/ *Brianna Dahlberg*

28

Brianna Dahlberg, Esq.

DECLARATION OF BRIANNA DAHLBERG

I, Brianna Dahlberg, declare and state as follows:

3 1. I am an attorney licensed to practice in the state and federal courts of California and
4 a Partner with Rome LLP. I make this declaration on personal knowledge and, if sworn as a witness,
5 could competently testify to each of the facts set forth herein.

6 2. Rome LLP is counsel *pro hac vice* for Defendant and Counterclaimant New U Life
7 Corporation (“New U Life”) in the above-captioned case.

8 3. With New U Life's consent, Rome LLP seeks to withdraw as counsel so that New U
9 Life will be solely represented in this matter by its local Nevada counsel, Puoy Premsrirut of Brown
10 Brown & Premsrirut.

11 4. Rome LLP makes this motion to withdraw with the consent of its client.

13 This declaration was executed on March 12, 2024 at Los Angeles, California. I declare under
14 penalty of perjury under the laws of the United States of America that the foregoing is true and
15 correct.

By: */s/ Brianna Dahlberg*

Brianna Dahlberg, Esq.

ORDER

2 IT IS ORDERED THAT Rome LLP and its individual attorneys Eugene Rome and Brianna
3 Dahlberg are granted leave to withdraw from representing New U Life in this matter. The names of
4 the firm and its individual attorneys shall be removed from the CM/ECF Service list.

IT IS SO ORDERED.

Dated: 3/13/2024

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE